

**Air Pollution Control District
Jefferson County, Ky
7 March 2000**

TITLE V PERMIT SUMMARY

Company: Texas Gas Transmission Corporation

Plant Location: 10327 Gaslight Way, Louisville, Kentucky 40299

Date App. Received: 15 December 1994

Date Admin. Complete: 1 July 1995

Date of Draft Permit: 12 March 2000

Date of Proposed Permit: 8 June 2000

District Engineer: Stephen Taylor

Permit No.: 92-97-TV

Plant ID: 0223

SIC Code: 4922

NAICS: 48621

AFS: 00223

Introduction:

This permit is to be issued according to: (1) District Regulation 2.16, (2) Title 40 of the Code of Federal Regulations Part 70, and (3) Title V of the Clean Air Act Amendments of 1990. Its purpose is to identify and consolidate existing District and Federal air requirements and to provide practical methods of determining continued compliance with these requirements.

Jefferson County is classified as an attainment area for sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), particulate matter (PM), particulate matter less than 10 microns (PM₁₀), and lead (Pb); unclassifiable for particulate matter less than 2.5 microns (PM_{2.5}); and is a moderate non-attainment area for ozone (O₃).

Application Type/Permit Activity:

- ☒ Initial Issuance
- ☐ Permit Revision
 - ☐ Administrative
 - ☐ Minor
 - ☐ Significant
- ☐ Permit Renewal

Compliance Summary:

- ☒ Compliance certification signed
- ☐ Compliance schedule included
- ☐ Source is out of compliance

I. Source Description

1. **Class I Area Impacts:** This plant is not located in or near a Class I area.
2. **Product Description:** Natural gas transmission
3. **Overall Process Description:** Nine compressor engines that combust natural gas and one compressor turbine that combusts natural gas. The engines and turbine are used to transmit natural gas.
4. **Site Determination:** There are no other facilities which are contiguous or adjacent and under common control.
5. **Emission Unit Summary:**
 - a. **U1:** One Cooper Bessemer engine, maximum rated capacity of 1500 bhp
 - b. **U2:** One Cooper Bessemer engine, maximum rated capacity of 1500 bhp
 - c. **U3:** One Cooper Bessemer engine, maximum rated capacity of 1500 bhp
 - d. **U4:** One Cooper Bessemer engine, maximum rated capacity of 1500 bhp
 - e. **U5:** One Cooper Bessemer engine, maximum rated capacity of 1500 bhp
 - f. **U6:** One Cooper Bessemer engine, maximum rated capacity of 1500 bhp
 - g. **U7:** One Cooper Bessemer engine, maximum rated capacity of 1500 bhp
 - h. **U8:** One Cooper Bessemer engine, maximum rated capacity of 1500 bhp
 - i. **U9:** One Cooper Bessemer engine, maximum rated capacity of 1500 bhp
 - j. **U13:** One General Electric turbine, maximum rated capacity of 12090 bhp
 - k. **U16:** One ethylene glycol storage tank, capacity 2727 gallons
 - l. **U17:** One portable pipeline distillate tank, capacity 560 gallons
 - m. **U18:** One portable station maintenance Ethylene Glycol or lube oil storage tank, capacity 430 gal
 - n. **U19:** One pipeline distillate storage tank, capacity 4400 gallons
 - o. **U20:** One new emergency Waukesha generator, max rated capacity 800bhp
6. **Fugitive Sources:** There are minor fugitive emissions of VOC from the equipment leaks in the natural gas piping. However, there are no regulatory limits on these emissions nor is there any regulatory basis to consider them in the Title V permit.
7. **Title V Major Source Status by Pollutant:**

Pollutant	Actual Emissions (tpy) 1998 Data	Major Source Status (based on PTE)
CO	29.30	Yes
NO _x	794.77	Yes
SO ₂	Negligible	No

Pollutant	Actual Emissions (tpy) 1998 Data	Major Source Status (based on PTE)
PM	Negligible	No
VOC	19.34	No
Single HAP >1 tpy		
Formaldehyde	3.62	Yes
Total HAPs	3.62	No

8. **MACT Standards:** The source is not subject to 40 CFR 63 - subpart HHH because there is no glycol dehydration unit at the site.

9. **Applicable Requirements:**

☐ PSD ☐ NSPS ☒ SIP ☐ Other
☐ NSR ☐ NESHAPS ☒ District-Origin ☐ MACT

10. **Referenced Federal Regulations in Permit:** None

II. Regulatory Analysis

1. **Emission and Operating Caps:** The source is not subject to any plant-wide emissions or operating caps.

2. **Compliance Status:** The source signed and submitted a Title V compliance certification in its permit application.

3. **Operational Flexibility:** The source did not request to operate under alternative operating scenarios in its Title V Permit Application.

4. **Testing Requirements:** Perform NO_x tests in accordance with the NO_x RACT plan submitted and approved by EPA and the District.

5. **Monitoring, Recordkeeping and Reporting Requirements:** The source is required to monitor, maintain records of, and report on various operating parameters to demonstrate ongoing compliance with all applicable requirements. Compliance reporting is required semi-annually, except where underlying applicable regulations or permit conditions require more frequent reporting. Periodic monitoring shall be performed as specified in the NO_x RACT plan submitted and approved by EPA and the District.

6. **Off-Permit Documents:** None

The District considers an "off-permit document" as a document on which a source's

compliance with given regulation(s) is contingent or which contains regulatory requirement(s), but is only referenced in a source's Title V Operating Permit. The designation "off-permit document" shall be made at the District's discretion, and may include, but not be limited to, documents such as Regulation 1.05 VOC compliance plans, Preventative Maintenance Program (PMP), Management Of Change System (MOCS); or other documents which are too voluminous to be included in a source's Title V Operating Permit, as determined by the District.

III. Other Requirements

1. **Temporary Facilities:** The source did not request to operate any temporary facilities.
2. **Short Term Activities:** The source did not report any short term activities.
3. **Compliance Schedule/Progress Reports:** The source has certified compliance with all applicable requirements; therefore, no compliance schedule or progress reports are necessary.
4. **Emissions Trading:** None
5. **Acid Rain Requirements:** The source is not subject to the Acid Rain Program.
6. **Stratospheric Ozone Protection Requirements:** Title VI of the CAAA regulates ozone depleting substances and requires a phase-out of their use. This rule applies to any source that manufactures, sells, distributes, or otherwise uses any of the listed chemicals. This source does not use any of the listed chemicals.
7. **Prevention of Accidental Releases 112(r):** The source does not manufacture, process, use, store, or otherwise handle one or more of the regulated substances listed in 40 CFR 68 Subpart F and Regulation 5.15, Chemical Accident Prevention Provisions, in a quantity in excess of the corresponding specified threshold amount.
8. **Insignificant Activities:** The following activities, as referenced in the source's Title V permit application, have been determined by the District to be insignificant.

Insignificant Activities		
Description	Quantity	Basis
Gasoline storage tank (238 gal)	1	Reg 2.02, sec 2.3.24
Pipeline fluid tank (56 gal)	1	Reg 2.02, sec 2.3.24
Fuel oil storage tanks (300 and 260 gal)	2	Reg 2.02, sec 2.3.9.2
Lubricating oil storage tanks	5	Reg 2.02, sec 2.3.9.2
Combustion sources <10MMbtu/hr	20	Reg 2.02, sec 2.1.1

Insignificant Activities		
Description	Quantity	Basis
Non-halogenated cold solvent parts cleaners with secondary reservoir *	2	Reg 2.02, sec 2.3.22
Internal combustion engines	Various	Reg 2.02, sec 2.2
Brazing, soldering or welding operation	Various	Reg 2.02, sec 2.3.4
Emergency relief vents	Various	Reg 2.02, sec 2.3.10
Residential/domestic equipment	Various	Reg 2.02, sec 2.3.16

1. Insignificant Activities are only those activities or processes falling into the general categories defined in Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Equipment associated with a specific operation or process (Emission Unit) shall be listed with the specific process even though there may be no applicable requirements. Information contained in the permit and permit summary shall clearly indicate that those items identified with negligible emissions have no applicable requirements.
 2. Activities identified In Regulation 2.02, Section 2, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source and must be included in the Title V permit.
- * i. Non-halogenated cold solvent parts cleaners shall be operated in compliance with all applicable sections of Regulations 6.18 and 7.18, including Section 4 of each.
- ii. No facility, having been designated as an insignificant activity, shall be exempt from any generally applicable requirements which shall include a 20% opacity limit for facilities not otherwise regulated.
- iii. No periodic monitoring shall be required for facilities designated as insignificant activities.